

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

*In re Vertiv Holdings Co Securities  
Litigation*

No. 1:22-cv-03572-GHW-OTW

**NOTICE OF DEFENDANTS' MOTION TO DISMISS  
THE AMENDED CONSOLIDATED COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Consolidated Complaint and The Platinum Defendants' Memorandum of Law in Support of Their Motion to Dismiss Plaintiffs' Amended Consolidated Complaint, the declaration of Audra J. Soloway and the exhibits annexed thereto, and all other papers and proceedings herein, Defendants Vertiv Holdings Co, Rob Johnson, David Fallon, Gary Niederpruem (collectively, "Officer Defendants"), David Cote, Joseph van Dokkum, Roger Fradin, Jacob Kotzubei, Matthew Louie, Edward L. Monser, Steven S. Reinemund, Robin L. Washington (collectively, "Director Defendants"), J.P. Morgan Securities LLC, Goldman Sachs & Co. LLC, Citigroup Global Markets Inc. (collectively, "Underwriter Defendants"), VPE Holdings, LLC, Vertiv JV Holdings LLC, PE Vertiv Holdings LLC, Platinum Equity, LLC, Platinum Equity Investment Holdings, LLC, Platinum Equity Investment Holdings Manager, LLC, Platinum Equity InvestCo, L.P., Platinum Equity Investment Holdings IC (Cayman), LLC, Platinum InvestCo (Cayman), LLC, Platinum Equity Investment Holdings III, LLC, and Platinum Equity Investment Holdings Manager III, LLC (collectively, "Platinum Equity Defendants"), by and through their attorneys, hereby respectfully move this Court, before the

Honorable Gregory H. Woods, United States District Judge, and the Honorable Ona T. Wang, United States Magistrate Judge, United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for an order, pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b), dismissing the Amended Consolidated Complaint (Dkt. 25). The grounds for this motion are set forth in the accompanying memoranda of law.

Dated: New York, New York  
January 20, 2023

Respectfully submitted,

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